

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
MONTGOMERY DIVISION**

DARREN ANDERSON, et al., §
§
Plaintiffs, §
§
v. § **CIVIL ACTION NO.**
§ **2:06-cv-00951-MEF-DRB**
§
WAYNE FARMS, LLC. §
§
§
Defendant. §

NOTICE OF FILING ADDITIONAL CONSENTS TO JOIN

Plaintiffs give notice of filing the attached Notices of Consent to Join executed by, TOMMY MOTLEY, SARAH ANN RUMPH, KISSE G. REDDING, SHANA PRUITT and DENNIS A. GREY, similarly situated employees to Plaintiffs, who likewise are or were subjected to the illegal pay practices at issue, and who wish to join the above captioned lawsuit.

Dated: March 6, 2007

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp
ROBERT JOSEPH CAMP
505 North 20th Street, Suite 825
Birmingham, Alabama 35203

(205) 930-6900-Telephone
(205) 930-6910- Facsimile

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2007, I electronically filed the above Notice with the Clerk of the District Court using CM/ECF System, which sent notification of such filing to:

Samuel A. Cherry
Attorney for Plaintiffs
scherry@cochranfirm.com

Lance Harrison Swanner
Attorney for Plaintiffs
lswanner@cochranfirm.com

Bernard D. Nomberg
Attorney for Plaintiffs
bnomberg@cochranfirm.com

Lisa Sharp
Attorney for Defendant
lsharp@balch.com

Wendy Madden
Attorney for Defendant
wmadden@balch.com

Pepper Crutcher, Jr.
Attorney for Defendant
Pcrutcher@balch.com

/s/ Robert J. Camp
ROBERT J. CAMP

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Tommie Motley [Print Name] states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms [Name of Plant] at the facility located in Union Springs, AL [City/State]. I worked at this location from 07/1989 [Date] to Present. [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms [Name of Plant] plant in Union Springs, AL [City/State] possibly other plants owned by Wayne Farms. [Name of Plant] If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 10 day of February, 2007.

Tommie Motley
[PRINT NAME]

X Tommie Motley
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Sarah Ann Rumph
[Print Name] states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne's Farm at the facility located in Union Springs AL. I worked at this location from 4/27/1988 to present.
[Name of plant]
[City/State]
[Date]
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne's Farm plant in Union Springs, and possibly other plants owned by Wayne's Farm. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.
[Name of Plant]
[City/State]
[Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of Sept, 2006.

Sarah A Rumph
[PRINTED NAME]

Sarah A Rumph
[SIGNED NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Kisse G. Redding states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
the facility located in Union Springs, AL I worked at this location from
01/01/2003 to Present.
[Name of Plant]
[City/State]
[Date]
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and
possibly other plants owned by Wayne Farms. If brought as a class
action under either federal or state law, I agree to be a named Plaintiff in such class.
[Name of Plant]
[City/State]
[Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 10 day of Feb., 2007.

Kisse G. Redding
[PRINT NAME]

Kisse G. Redding
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Shane Pruitt
[Print Name] states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Union Farms [Name of Plant] at the facility located in Union Springs [City/State]. I worked at this location from Dec 2004 to Apr 2005.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Union Farms plant in Union Springs, AL [Name of Plant] [City/State] possibly other plants owned by Union Farms [Name of Plant]. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 19th day of Feb., 2007. ad

Shane Pruitt
[PRINT NAME]

Shane Pruitt
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Dennis A. Grey
[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at [Name of Plant] the facility located in Union Springs, Al. [City/State] I worked at this location from March, 15, 2003 to Sept. 15, 2004. [Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs, Al, and [Name of Plant] [City/State] possibly other plants owned by Wayne Farms LLC. [Name of Plant] If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16th day of February, 2007.

Dennis A. Grey
[PRINT NAME]

Dennis A. Grey
[SIGN NAME]